

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-202-E**

IN RE: Petition of Duke Energy Carolinas, LLC)
and Duke Energy Progress, LLC for)
Approval of CRPE Queue Number)
Proposal, Limited Waiver of Generator)
Interconnection Procedures, and Request)
for Expedited Review)

**PETITION
TO
INTERVENE**

This Docket was opened upon the June 19, 2018 correspondence of counsel for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (hereinafter together as, “Duke”). This Commission established Commission Docket 2018-202-E, on June 19, 2018. Duke sought approval from this Commission for a CRPE queue number proposal, a limited waiver of the South Carolina Generator Interconnection Procedures, and an expedited review of its Petition.

Petitioner herein is South Carolina Solar Business Alliance, Inc., (“SCSBA” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

PETITIONER

1. SCSBA is a Public Benefit Non-Profit Corporation, by a conversion filing on May 17, 2017, with the South Carolina Secretary of State’s office, originally organized on October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2. SCSBA's principal place of business is currently co-located with that of Southern Current LLC at 1519 King Street Extension, Charleston, South Carolina 29405 and SCSBA’s mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 1090 Jack Primus Road, Charleston, South Carolina, 29492.

3. SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

4. SCSBA is a Public Benefit Non-Profit Corporation, whose Board Members are the following individuals, all of whom conduct solar energy-related business in South Carolina under the company names indicated:

- a. Bret Sowers (Southern Current LLC);
- b. Jarrett Branham (Alder Energy Systems, LLC);
- c. Dave McNeil (Hannah Solar Government Services, LLC);
- d. Andy Israelson (E.ON Climate and Renewables);
- e. Steffanie Dohn (Southern Current LLC);
- f. Mark Walter (Tradewind Energy) and
- g. Tyler Norris (Cypress Creek Renewables).

5. SCSBA's Trade Members includes solar energy developers, engineering procurement and construction, contractors, professional service firms, equipment distributors and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. All of SCSBA's Board Members' companies maintain offices in South Carolina.

6. Therefore, the decision of this Commission is important to the Petitioner, SCSBA from a financial and business standpoint, as is outlined in more detail hereinbelow.

7. Specifically, Petitioner, SCSBA's Trade Members conduct business with Duke and Petitioner, SCSBA has material interest in the subject matter of this Docket.

8. Petitioner's position is that Petitioner, SCSBA and its Trade Members have a direct and substantial interest in the approval process to be completed by this Commission in this Docket. Specifically, SCSBA's Trade Members will be directly impacted by Duke's proposed CPRE queue number proposal and the proposed waiver of certain Interconnection Procedures. Petitioner's interests cannot be adequately addressed by any other party. Therefore, the decision of this Commission is important to the Petitioner from a financial and a business standpoint.

9. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important approval process to be conducted in this Docket.

10. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

11. The granting of SCSBA's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

12. This Petition to Intervene is timely filed with this Commission.

13. Petitioner, SCSBA has previously received approval for intervention from this Commission on numerous occasions, including in recent Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket No. 2016-2-E, Docket No. 2016-1-E, Docket 2016-3-E, Docket 2016-9-E, Docket 2016-8-E, Docket 2016-10-E, Docket 2017-2-E, Docket 2017-1-E, Docket 2017-3-E, Docket 2017-305-E, Docket 2018-2-E and Docket 2018-3-E.

14. SCSBA is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

(a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;

(b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

(c) For such other and further relief as is just and proper.

[Signature Page Follows]

Respectfully Submitted,

/s/

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Counsel for Petitioner, South Carolina Solar
Business Alliance, Inc.

July 19, 2018

Columbia, South Carolina